<div align="center"><b><u>REMARKS</u></b></div>

Applicants respectfully request further examination and reconsideration in view of the above amendments and the arguments set forth fully below. Claims 1-32 were previously pending in this application. Within the Office Action, Claims 1-32 have been rejected. By the above amendment, Claims 1, 7-11, 13, 17-23 and 27-32 have been amended and new Claims 33-38 have been added. Accordingly, Claims 1-38 are currently pending.

**Objections To The Drawings**

Within the Office Action, the drawings have been objected to because the figures are too dark. With this response, replacement drawings are being filed which are lighter than the original drawings.

**Objections To The Claims**

Within the Office Action, Claims 22 and 23 have been objected to because the preamble of each should refer back to "the computer product." By the above amendment, Claims 22 and 23 have been amended to refer back to "the computer product."

**Rejections Under 35 U.S.C. § 112**

Within the Office Action, Claims 9, 19 and 29 have been rejected under 35 U.S.C. § 112 as being indefinite. Specifically, it is stated within the Office Action that the phrase "such as" renders the Claims 9, 19 and 29 indefinite. By the above amendment, Claims 9, 19 and 29 have been amended to remove the phrase "such as."

Claims 7, 8, 10, 13, 17, 18, 20, 27, 28, and 30 are amended for reasons of form.

**Rejections Under 35 U.S.C. § 102**

Within the Office Action, Claims 1, 5, 7, 10, 11, 15, 17, 20, 21, 25, 27 and 30 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent. No. 6,642,939 to Vallone ("Vallone"). Applicants argue that Claims 1, 5, 7, 10, 11, 15, 17, 20, 21, 25, 27 and 30 are allowable over the teachings of Vallone because Vallone does not teach receiving a composite video feed of an event including a plurality of assets associated with the event. Vallone also does not teach obtaining user preference data to determine which of the plurality of assets associated with the event to display on each of a plurality of display regions.

Vallone teaches a multimedia schedule presentation system which provides a program guide area including a list of programs that are currently airing or are scheduled to air. [Vallone, Abstract] Vallone teaches that the program guide area is semi-transparent and overlays on the broadcast program material that the user is currently watching. [Vallone, col. 2, lines 6-8] Within the program guide, the user is able to navigate through menus by moving to the right or the left. [Vallone, col. 15, lines 18-25]

In contrast to the teachings of Vallone, the claimed method and apparatus for a frame work of structured overlay of real time graphics collects and transmits event related data or assets with the AV signal. As used within the specification, the term assets refers to event related data transmitted to the viewer's receiver and displayed in various windows together with the AV signal. [Present Specification, page 4, lines 17-19] In the example used within the specification, the event is a car-racing event. The AV elementary video feed and the associated assets are delivered to a receiving unit which decodes the incoming signal and presents the AV elementary video feed and the chosen assets to a user. The presentation engine automatically rearranges the screen layout based on user preference input, and also taking into consideration the broadcaster's region definition. Regions are defined using meta data and the assets displayed are associated with a defined region using meta tags. As described above, Vallone does not teach receiving a composite video feed of an event including a plurality of assets associated with the event.

Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. As further described above, Vallone does not teach obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions.

The independent Claim 1 is directed to a method of automatically displaying multiple assets on a screen. The method of Claim 1 comprises receiving a composite video feed comprising an elementary video feed of an event and a plurality of assets associated with the event, obtaining user preference data to determine which of the plurality of assets to display on each of a plurality of display regions, aligning and scaling assets to be displayed in corresponding display regions according to the obtained user preference data and displaying the aligned and scaled assets with the elementary video feed. As described above, Vallone does not teach receiving a composite video feed of an event including a plurality of assets associated with the event. Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. As further described above, Vallone does not teach obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions. For at least these reasons, the independent Claim 1 is allowable over the teachings of Vallone.

Claims 5, 7 and 10 are all dependent on independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Vallone. Accordingly, the dependent Claims 5, 7 and 10 are all also allowable as being dependent on an allowable base claim.

The independent Claim 11 is directed to an apparatus for automatically displaying multiple assets on a screen. The apparatus of Claim 11 comprises means for receiving a composite video feed comprising an elementary video feed of an event and a plurality of assets associated with the event, means for obtaining user preference data to determine which of the plurality of assets to display on each of a plurality of display regions, means for aligning and scaling assets to be displayed in corresponding display regions according to the obtained user

preference data and means for displaying the aligned and scaled assets with the elementary video feed. As described above, Vallone does not teach receiving a composite video feed of an event including a plurality of assets associated with the event. Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. As further described above, Vallone does not teach obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions. For at least these reasons, the independent Claim 11 is allowable over the teachings of Vallone.

Claims 15, 17 and 20 are all dependent on independent Claim 11. As discussed above, the independent Claim 11 is allowable over the teachings of Vallone. Accordingly, the dependent Claims 15, 17 and 20 are all also allowable as being dependent on an allowable base claim.

The independent Claim 21 is directed to a computer program product embodied in a computer readable medium for automatically displaying multiple assets on a screen. The computer program product of Claim 21 comprises code means for receiving a composite video feed comprising an elementary video feed of an event and a plurality of assets associated with the event, code means for obtaining user preference data to determine which of the plurality of assets to display on each of a plurality of display regions, code means for aligning and scaling assets to be displayed in corresponding display regions according to the obtained user preference data and code means for displaying the aligned and scaled assets with the elementary video feed. As described above, Vallone does not teach receiving a composite video feed of an event including a plurality of assets associated with the event. Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. As further described above, Vallone does not teach obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions. For at least these reasons, the independent Claim 21 is allowable over the teachings of Vallone.

Claims 25, 27 and 30 are all dependent on independent Claim 21. As discussed above, the independent Claim 21 is allowable over the teachings of Vallone. Accordingly, the dependent Claims 25, 27 and 30 are all also allowable as being dependent on an allowable base claim.

**Rejections Under 35 U.S.C. § 103**

Within the Office Action, Claims 2-4, 12-14, 22-24, 31 and 32 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Vallone in view of U.S. Patent. Publication No. 2002/0010928 to Sahota ("Sahota"). The Applicants respectfully disagree. Applicants believe that no *prima facie* case for obviousness has been made because the combination of Vallone and Sahota does not teach or suggest all elements recited in the independent claims. In addition, Applicants believe that no *prima facie* case for obviousness has been made because there is no extrinsic or intrinsic motivation to combine these two references.

As described above, Vallone teaches a multimedia schedule presentation system which provides a program guide area including a list of programs that are currently airing or are scheduled to air. [Vallone, Abstract] Vallone teaches that the program guide area is semi-transparent and overlays on the broadcast program material that the user is currently watching. [Vallone, col. 2, lines 6-8] Within the program guide, the user is able to navigate through menus by moving to the right or the left. [Vallone, col. 15, lines 18-25] As recognized within the Office Action, Vallone does not teach that the composite video feed comprises meta data and meta tags associated with the plurality of display regions.

Sahota teaches a method and system for integrating internet advertising with television commercials. Sahota teaches that interactive content, such as Internet advertising content is automatically integrated with television broadcast content for display.

In contrast to the teachings of Vallone, Sahota and their combination, the method and apparatus for a frame work for structured overlay of real time graphics collects and transmits event related data or assets with the AV signal. As used within the specification, the term assets refers to the event related data transmitted to the viewer's receiver and used to display various windows alongside the AV signal. [Present Specification, page 4, lines 17-19] In the example used within the specification, the event is a car-racing event. The AV elementary stream and the associated assets are delivered to a receiving unit which decodes the incoming signal and presents the AV elementary stream and the chosen assets to a user. The presentation engine automatically rearranges the screen layout based on user preference input and taking into consideration the broadcaster's region definition. Regions are defined using meta data and the assets displayed are associated with a defined region using meta tags. As described above, Vallone does not teach receiving a composite video feed of an event including a plurality of assets associated with the event. Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. Sahota also does not teach receiving a composite video feed of an event including a plurality of assets associated with the event. Accordingly, neither Vallone, Sahota nor their combination teach receiving a composite video feed of an event including a plurality of assets associated with the event. As further described above, Vallone does not teach obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions. Sahota also does not teach obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions. Accordingly, neither Vallone, Sahota nor their combination teach obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions.

Claims 2-4 are all dependent on the independent Claim 1. Claims 12-14 are all dependent on the independent Claim 11. Claims 22-24 are all dependent on the independent

Claim 21. As discussed above, the independent Claims 1, 11 and 21 are all allowable over the teachings of Vallone. Accordingly, the dependent Claims 2-4, 12-14 and 22-24 are all also allowable as being dependent on an allowable base claim.

The independent Claim 31 is directed to a system for automatically displaying multiple assets on a screen. The system of Claim 31 comprises means for generating an elementary video feed of an event, a plurality of assets associated with the event, meta data determining a plurality of region definitions, and meta tags associating at least one of the plurality of assets with a region definition, means for transmitting the elementary video feed, the plurality of assets, the meta data, and the meta tags as a composite video feed, means for receiving the composite video feed, means for obtaining user preference data to determine which of the plurality of assets to display on each of a plurality of display regions, means for aligning and scaling assets to be displayed in corresponding display regions according to the obtained user preference data and means for displaying the aligned and scaled assets with the elementary video feed. As described above, neither Vallone, Sahota nor their combination teaches receiving a composite video feed of an event including a plurality of assets associated with the event. Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. Sahota teaches integrating Internet content with television commercials. As further described above, neither Vallone, Sahota nor their combination teaches obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions. For at least these reasons, the independent Claim 31 is allowable over the teachings of Vallone, Sahota and their combination.

The independent Claim 32 is directed to a method of automatically displaying multiple assets on a screen. The system of Claim 31 comprises receiving an elementary video feed of an event, a plurality of assets associated with the event, meta data determining a plurality of region definitions, meta tags associating each display region with at least one of a plurality of assets, obtaining user preference data and using the obtained user preference data to determine which of

the plurality of assets to display in each display region, aligning and scaling assets to be displayed in corresponding display regions according to the obtained user preference data, meta data and meta tags and displaying the aligned and scaled assets with the elementary video feed. As described above, neither Vallone, Sahota nor their combination teaches receiving a elementary video feed of an event including a plurality of assets associated with the event. Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. Sahota teaches integrating Internet content with television commercials. As further described above, neither Vallone, Sahota nor their combination teaches obtaining user preference data to determine which of the plurality of assets associated with the event, to display on each of a plurality of display regions. For at least these reasons, the independent Claim 32 is allowable over the teachings of Vallone, Sahota and their combination.

Applicants believe the combination of Vallone and Sahota is improper because there is no extrinsic or intrinsic motivation to combine these two references and that hindsight has impermissibly been used to form these claim rejections. As discussed above, Vallone teaches receiving a program guide including a list of programs that are currently airing or are scheduled to air. Sahota teaches integrating Internet content with television commercials. Even if the combination of these two references disclosed all elements in Applicants' independent claims, providing a program guide including a list of programs and integrating Internet content with television commercials are two different things. There is no hint, teaching, or suggestion in either Vallone or Sahota to motivate one skilled in the art to combine their teachings. It is only with the benefit of the presently claimed invention as a "template" that one would consider combining the program guide of Vallone with the integrated content system of Sahota.

The justification for the combination must be from the perspective of the time the invention was made. Applicants respectfully believe that additional argument must be provided to justify combining Vallone and Sahota so as to comply with well-known guidance for rejections under § 103:

(1) there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings;

(2) there must be a reasonable expectation of success; and

(3) the prior art reference, or references, must teach or suggest all the claim limitations.  See e.g., MPEP § 2143.

Within the Office Action, Claims 6, 16 and 26 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Vallone.  The Applicants respectfully disagree.  Claim 6 is dependent on the independent Claim 1.  Claim 16 is dependent on the independent Claim 11.  Claim 26 is dependent on the independent Claim 21.  As discussed above, the independent Claims 1, 11 and 21 are all allowable over the teachings of Vallone.  Accordingly, the dependent Claims 6, 16 and 26 are all also allowable as being dependent on an allowable base claim.

Within the Office Action, Claims 8, 9, 18, 19, 28 and 29 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Vallone in view of U.S. Pat. No. 5,673,401 to Volk et al. ("Volk").  The Applicants respectfully disagree.  Claims 8 and 9 are both dependent on the independent Claim 1.  Claims 18 and 19 are both dependent on the independent Claim 11.  Claims 28 and 29 are both dependent on the independent Claim 21.  As discussed above, the independent Claims 1, 11 and 21 are all allowable over the teachings of Vallone.  Accordingly, the dependent Claims 8, 9, 18, 19, 28 and 29 are all also allowable as being dependent on an allowable base claim.

**New Claims**

New independent Claim 36 and dependent Claims 37 and 38 are added.  Support for these new claims is found for example in Figures 3-5 and associated text.  Applicants believe these new claims are patentable over the references cited thus far for at least the same reasons as

discussed above. For example, Claim 36 recites that an elementary video feed of an event is received **as the event occurs**, and that received information assets associated with the event **change as the event occurs**. And, the images from the elementary video feed and the changing information assets are displayed together. Neither, Vallone nor Sahota, nor a combination of the two, disclose or suggest these claimed features.

For the reasons given above, the Applicants respectfully submit that the pending claims are in condition for allowance. Applicants request the Examiner reconsider, withdraw the rejections in the Office Action, and allow all pending claims. If the Examiner has any questions or comments, they are encouraged to call the undersigned at (408) 530-9700 to quickly resolve any issues.
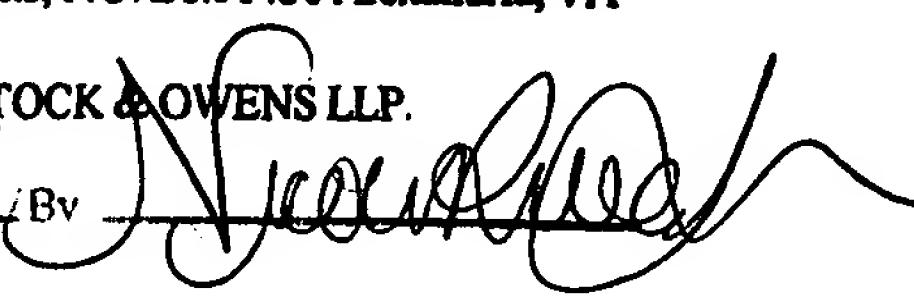
Respectfully submitted,
HAVERSTOCK & OWENS LLP


Dated: _December 6, 2005_          By: _____
                                         Jonathan O. Owens
                                         Reg. No. 37,902
                                         Attorneys for Applicant(s)

**Amendments to the Drawings:**

The attached sheets of drawings include replacement sheets for Figures 1-10.  The replacement sheets replace the original drawing sheets including Figures 1-10.